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**From:** Parker, Cindy [parker.cindy@epa.gov]  
**Sent:** 8/14/2017 2:50:31 PM  
**To:** Madden, Joshua [madden.joshua@epa.gov]  
**Subject:** FW: ethylene oxide emissions - NATA review

Checking up on a few things today:

- 1) Can we verify what the permit limits for the facilities discussed below are? I think they are on Nevine's chart. If not, we should ask her, if we have the permits posted, to verify what their EtO limits are.
- 2) I sent Nevine an email to check on permit limits for Bayport Underwood – it is the Pasadena location of Lyondell Basell. Will forward you the email I sent her.

If the reported emissions are below the permitted levels for these facilities, then they may drop off the list?

Another question – do you know if the change from census block to census tract is the only reason some of the facilities dropped off? That's the premise we've been working under, but I wonder?

Hope you had a good weekend.

Cindy

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**From:** Kelly Petersen [mailto:Kelly.Petersen@LA.GOV]  
**Sent:** Thursday, July 06, 2017 2:10 PM  
**To:** Strum, Madeleine <Strum.Madeleine@epa.gov>  
**Cc:** Verhalen, Frances <verhalen.frances@epa.gov>; Palma, Ted <Palma.Ted@epa.gov>; Smith, Darcie <Smith.Darcie@epa.gov>; Maureen Ducote <Maureen.Ducote@la.gov>; Parker, Cindy <parker.cindy@epa.gov>; Madden, Joshua <madden.joshua@epa.gov>  
**Subject:** RE: ethylene oxide emissions - NATA review

Those are the reported values and they are below the permitted limit. We have no reason to doubt the data.

Kelly Petersen  
Air Planning and Assessment Division  
Louisiana Department of Environmental Quality  
Phone: (225) 219-3397 Fax: (225) 325-8141 [kelly.petersen@la.gov](mailto:kelly.petersen@la.gov)

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**From:** Strum, Madeleine [mailto:Strum.Madeleine@epa.gov]  
**Sent:** Wednesday, July 05, 2017 11:48 AM  
**To:** Kelly Petersen  
**Cc:** Verhalen, Frances; Palma, Ted; Smith, Darcie; Maureen Ducote; Parker, Cindy; Madden, Joshua  
**Subject:** RE: ethylene oxide emissions - NATA review

Hi Kelly

There are 2 more facilities (listed below) that I don't have a record of your reviewing. Can you let me know if these emissions (columns highlighted in yellow) are correct? These facilities cause the tract risk to exceed 100 in a million:

Note that details on the process/release point (modeling file) ethylene oxide emissions are attached.

Thanks!!!

State	EPA Region	County	FIPS	Tract	Population	TRACT PT-Stationary Point Cancer Risk (per million)	Driver Facility	State Reviewed Data? (Y/N) 5/15/17 version	Change Submitted? (Y/N)	NOTES	State or Tribe	FIPS
LA	EPA Region 6	Ascension	22005	2200503030	13728	97.828	7445611				Louisiana	2205
LA	EPA Region 6	Iberville	22047	2204795310	2449	95	8467311				Louisiana	2207

Madeleine Strum|U.S. Environmental Protection Agency|109 TW Alexander Drive, RTP, NC 27711  
Office of Air Quality Planning and Standards|Air Quality Assessment Division|Emission Inventory and Analysis Group|919 541 2383

Mailing Address: US EPA OAQPS (C339-02)/ RTP, NC 27711

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**From:** Kelly Petersen [mailto:Kelly.Petersen@LA.GOV]  
**Sent:** Tuesday, March 21, 2017 5:16 PM  
**To:** Strum, Madeleine <Strum.Madeleine@epa.gov>  
**Cc:** Verhalen, Frances <verhalen.frances@epa.gov>; Palma, Ted <Palma.Ted@epa.gov>; Smith, Darcie <Smith.Darcie@epa.gov>; Maureen Ducote <Maureen.Ducote@la.gov>  
**Subject:** RE: ethylene oxide emissions - NATA review

Madeleine,  
I reviewed these emissions and they are all below the permitted limit, so I have no reason to doubt their validity. See the updates to the chart below.

Thanks,  
Kelly Petersen  
Air Planning and Assessment Division  
Louisiana Department of Environmental Quality  
Phone: (225) 219-3397 Fax: (225) 325-8141 kelly.petersen@la.gov

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**From:** Strum, Madeleine [mailto:Strum.Madeleine@epa.gov]  
**Sent:** Tuesday, March 21, 2017 7:45 AM  
**To:** Kelly Petersen  
**Cc:** Verhalen, Frances; Palma, Ted; Smith, Darcie  
**Subject:** ethylene oxide emissions - NATA review

Hi Kelly,

A number of Louisiana facilities have ethylene oxide (EtO) emission estimates that could result in highly elevated tract risks. As we indicated in our January 2014 NATA modeling update (email from Sally Dombrowski 1/27/2017), the cancer health benchmark for Ethylene Oxide (EtO) was updated by EPA in December 2016 ([https://cfpub.epa.gov/ncea/iris2/chemicalLanding.cfm?substance\\_nmbr=1025](https://cfpub.epa.gov/ncea/iris2/chemicalLanding.cfm?substance_nmbr=1025)) and cancer risk levels for this pollutant are approximately 50 times higher.

In terms of annual emissions, the largest is Union Carbide, at about 15 tons EO emissions.

State or Tribe	FIPS	County	EIS facility_id	agy_facility_id	facility_name
Louisiana	22089	St. Charles	7202911	2083	Union Carbide Operations
Louisiana	22047	Iberville	7451011	27495	BCP Ingredient Inc
Louisiana	22047	Iberville	5504811	3263	Taminco US Inc
Louisiana	22095	St. John the Baptist	5287111	13560	Air Products P Manufacturing Plant
Louisiana	22005	Ascension	8465611	2049	BASF Corp - G Site
Louisiana	22019	Calcasieu	8468011	3271	Sasol Chemicals Charles Chemi

These (along with a few others) are all on the "Jan2017 Update" of the SharePoint check list

[https://usepa.sharepoint.com/sites/oar\\_Work/NATAREVIEW/2014Facility/Data/CheckList/checklist.xlsx?d=w276998ab32364c90a67e05342b2904ac](https://usepa.sharepoint.com/sites/oar_Work/NATAREVIEW/2014Facility/Data/CheckList/checklist.xlsx?d=w276998ab32364c90a67e05342b2904ac)

Have you verified the emissions and release parameters for these facilities?

Madeleine Strum | U.S. Environmental Protection Agency | 109 TW Alexander Drive, RTP, NC 27711

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